

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

M.H., et. al,

Plaintiffs,

v.

Omegle.com, LLC,

Defendant.

Civil Action No. 2:20-cv-11294-KM-JBC

**CERTIFICATION OF JAMES T.  
PRUSINOWSKI, ESQ. IN SUPPORT  
OF *PRO HAC VICE* ADMISSION OF  
VENKAT BALASUBRAMANI, ESQ.  
AND STACIA N. LAY, ESQ.**

1. I, JAMES T. PRUSINOWSKI, ESQ., am a member of the law firm Trimboli & Prusinowski LLC, located at 268 South Street, Morristown, NJ 07960, local counsel for Defendant Omegle.com, LLC in this action. I make this Certification based on personal knowledge in support of Defendant's motion to admit Venkat Balasubramani and Stacia N. Lay as counsel *pro hac vice* to represent Defendant in this matter.

2. I was admitted to practice before the Supreme Court for the State of New Jersey in 2001 and am a member in good standing of the Bar of the State of New Jersey.

3. Mr. Balasubramani and Ms. Lay are attorneys in the law firm of Focal PLLC, located at 900 1st Avenue S., Suite 201, Seattle, Washington 98134, (206)

529-4827. They are both members of good standing of the bar of the State of Washington. They are also admitted to practice before the following:

**Venkat Balasubramani:** California and Oregon; the United States District Court for the Western District of Washington; the United States District Court for the Eastern District of Washington; the United States District Court for the Northern District of California; the United States District Court for the Central District of California; the United States District Court for the Southern District of California; the United States District Court for the Eastern District of California; the United States Court of Appeals for the First Circuit; and the United States Court of Appeals for the Ninth Circuit.

**Stacia N. Lay:** the United States District Court for the Western District of Washington; and the United States Court of Appeals for the Ninth Circuit.

4. Certifications of Mr. Balasubramani and Ms. Lay and Certificates of Good Standing from the State of Washington are submitted in support of this Motion.

5. Mr. Balasubramani and Ms. Lay have been engaged by Defendant and have requested the assistance of my firm for local representation of Defendant in this action. I respectfully submit that the *pro hac vice* admissions of Mr. Balasubramani and Ms. Lay are necessary to the effective representation of

Defendant in this matter. Accordingly, I respectfully move for their admissions of *pro hac vice*.

I certify that all of the foregoing statements are true. If any of the foregoing statements by me are willfully false, I am subject to punishment by law.

Dated: November 13, 2020

s/James T. Prusinowski

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